

RAAB, STURM & GANCHROW

COUNSELORS AT LAW
2125 CENTER AVENUE, SUITE
FORT LEE, NEW JERSEY 07024
Tel: (201)292-0150
Fax: (201)292-0152

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/18/2023

RONALD RAAB*
IRA A. STURM****
ARI D. GANCHROW**

MAURA E. BREEN***
SAMUEL R. BLOOM*****

* ADMITTED IN NY
** ADMITTED IN NY AND NJ
*** ADMITTED IN NY AND CT
**** ADMITTED IN NY AND FLA
***** ADMITTED IN NY, NJ AND MD

January 17, 2023

VIA ECF ELECTRONIC FILING

Hon. Analisa Torres, U.S.D.J.
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15D
New York, New York 10007

**Re: Kyle Bragg, as Trustee, et al. v. Allied Cleaning & Maintenance Services, Inc.
Civil Action No. 22-cv-9582**

Dear Judge Torres:

Our firm represents the Plaintiffs in this matter (the "Funds"). Pursuant to Your Honor's Order dated November 16, 2022, a joint letter and jointly proposed Case Management Plan is due to be filed today, January 17, 2023. In light of Defendant Allied Cleaning & Maintenance Services, Inc. ("Defendant") failure to appear, and the Funds' imminent Order to Show Cause for Default Judgment, the Funds ask that the deadline be adjourned.

The Funds seek unpaid employee benefit contributions allegedly owed by Defendant. The Complaint was filed on November 9, 2022. See ECF Document No. 1. Defendant was served with a summons and Complaint on November 15, 2022. The deadline for Defendant to answer or otherwise respond to the Complaint was December 6, 2022. Defendant, to date, has not appeared, and a Clerk's Certificate of Default was issued on January 11, 2022. See ECF Document No. 15. The undersigned is presently preparing, pursuant to Your Honor's Rules, an Order to Show Cause, with supporting Affidavits and exhibits, and commits to filing said papers no later than January 23, 2023. In light of these developments, and the fact that Defendant's nonappearance renders the Funds unable to prepare a joint letter or case management plan, the Funds respectfully ask that the Court adjourn the deadline.

GRANTED. The parties' deadline to file a joint letter and case management plan is ADJOURNED *sine die*. By **January 23, 2023**, Plaintiffs shall move for default judgment.

SO ORDERED.

Dated: January 18, 2023
New York, New York



ANALISA TORRES
United States District Judge